

BRADLEY/GROMBACHER LLP

Marcus J. Bradley, Esq. (SBN 174156)
Kiley L. Grombacher, Esq. (SBN 245960)
31365 Oak Crest Dr., Suite 240
Westlake Village, California 91361
Telephone: (805) 212-5124
Facsimile: (805) 270-7589
Email: mbradley@bradleygrombacher.com
Email: kgrombacher@bradleygrombacher.com

Attorneys for Plaintiff IFONIA GELIN

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IFONIA GELIN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CHUBBY SNACKS, INC., a Delaware
company

Defendant.

CASE NO. 24-CV-07416-JD

[Assigned to Hon. James Donato, Courtroom 11]

**STIPULATION TO STAY
PROCEEDINGS; [PROPOSED] ORDER**

Complaint Filed: October 24, 2024

TO THE HONORABLE COURT, ALL PARTIES AND COUNSEL OF RECORD:

Plaintiff Ifonia Gelin (“Plaintiff”) and Defendants Chubby Snacks, Inc. (“Defendants”) (collectively, the “Parties”) herein stipulate as follows:

WHEREAS, on October 24, 2024, Plaintiff filed the initiating complaint in this action;

WHEREAS, on October 25, 2024, this Court issued a Scheduling Order setting an Initial Case Management Conference for January 23, 2025 via video conference;

WHEREAS, the parties have conferred and Defendant has advised that its company is nearing insolvency and intends to undertake insolvency proceedings and/or dissolution;

WHEREAS, given the financial condition of the Defendant and to permit Plaintiff time to evaluate such claims, the parties have agreed to stay the action.

THEREFORE, the Parties jointly stipulate and request the following, that the action be stayed for ninety (90) days.

IT IS SO STIPULATED.


DATED: January 21, 2025

BRADLEY/GROMBACHER, LLP

By: /s/ Kiley L. Grombacher
Marcus J. Bradley, Esq.
Kiley L. Grombacher, Esq.
Attorneys for Plaintiff

DATED: January 21, 2025

O'BRIEN & ZEHNDER LAW FIRM

By: 
John A O'Brien
Attorneys for Defendant